

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEE  
FOR PERSONAL INJURY AND DEATH CLAIMS**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haefele, <i>Liaison Counsel</i> MOTLEY RICE LLC
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**VIA CM/ECF**

October 16, 2023

The Honorable Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

**Re: *In Re: Terrorist Attacks on Sept. 11, 2001*, 03 MDL 1570 (GBD)(SN)**

Dear Judge Netburn:

The Plaintiffs' Executive Committee for Personal Injury and Death Claims ("PEC") writes in response to the Court's October 11, 2023 Order seeking input from the PEC on whether it has any comments or suggestions on the proposed draft materials the Court provided in connection with default-judgment motions. *See* ECF No. 9372 (referring to ECF No. 9355). The members of the PEC conferred regarding the Court's proposals and agreed that the proposed default-judgment exhibit templates, while cumulative, would likely address the Court's stated concerns regarding default-judgment motions previously filed and resolve some of these concerns going forward.

Furthermore, Motley Rice LLC continues to work toward updating the lists of represented plaintiffs and default filings to help counsel avoid future duplicate default filings, consistent with the Court's previous direction at ECF No. 9280 (citing ECF No. 3435). Toward that goal, Motley Rice is preparing a revised template for circulation to all Plaintiffs' counsel with claims before the Court for personal injury or death (including solatium claims arising from deaths on September 11, 2001) to finalize a new and current list of represented plaintiffs. In addition, Motley Rice LLC has updated the list of default judgments the Court has entered against the Islamic Republic of Iran and its agencies and instrumentalities, is preparing the list of pending default judgments being sought against the Islamic Republic of Iran and its agencies and instrumentalities, and is preparing lists related to default-judgment motions pending or previously granted by the Court against The Taliban and any other defendants. Motley Rice LLC anticipates that the lists will be accessible to all counsel in the next few weeks by providing access to all of Plaintiffs' counsel within the MDL

The Honorable Sarah Netburn

October 16, 2023

Page 2

to these charts through the ShareFile platform while ensuring that the spreadsheets are locked and cannot be altered by anyone other than the administrators within the Motley Rice LLC firm.

Should the Court have any additional concerns, the PEC remains available as always to address any questions or concerns that the Court may have.

Respectfully submitted,

/S/ John M. Eubanks

On behalf of the Plaintiffs' Executive Committee  
for Personal Injury and Death Claims

cc: All counsel of record (via CM/ECF)